

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHINNAMMA MATTHEW

Plaintiff, : CIVIL ACTION NO. 05-CV-3599

vs.

**TENET HEALTHCARE
CORPORATION, TENET HEALTH
SYSTEM PHILADELPHIA, INC.
AND TENET HEALTHSYSTEM
PARKVIEW LLC**

Defendant.

DECLARATION OF WANDA AMARO

I, Wanda Amaro, am the undersigned, and declare the following:

1. This Declaration is being given of my own personal knowledge, in support of Defendants' Motion to Dismiss or, Alternatively, to Stay and to Compel Arbitration.

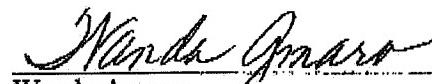
2. At the time of the events set forth in Plaintiff's Complaint, I was employed as the Human Resources Director for the Parkview Hospital facility. In this capacity, my responsibilities included, but were not limited to, management and oversight of personnel matters for the Parkview Hospital facility.

3. During my employment with Tenet, Tenet utilized an Open Door Policy and Fair Treatment Process for all employees. A copy of the Open Door Policy and Fair Treatment Process was provided to Plaintiff upon her employment with TenetHealthSystem, City Avenue I.J.C., and a copy is attached to Tenet's Motion to Compel Arbitration as Exhibit B. Plaintiff signed the Arbitration Agreement contained in the Fair Treatment Process on November 30, 1998. A copy of the signed Arbitration Agreement is attached to Tenet's Motion to Compel Arbitration as Exhibit C.

4. On August 23, 2003, Chinnamma Matthew invoked Tenet's Fair Treatment Process procedures by filing a Step 1 grievance regarding Tenet's decision not to provide her with severance following her rejection of an offered position at another Tenet facility. Thereafter, on September 7, 2003, Matthew advanced her grievance to Step 2 of the Fair Treatment Process.

5. During my employment, the Parkview facility at which Plaintiff was employed regularly employed employees from inside of Pennsylvania, as well as employees from states other than Pennsylvania, including New Jersey and Delaware, which out-of-state employees commuted from outside of Pennsylvania to the Parkview facility to work.

6. I declare under penalty of perjury that the foregoing is true and correct.


Wanda Amaro

Executed on: 11/17/05